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December 10, 2009

Urban Greening for Sustainable Communities Program  
California Natural Resources Agency  
Attn: Bonds and Grants Unit  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

Dear Grants Guidelines Team,

On behalf of The Trust for Public Land, thank you for the opportunity to review and provide comments on the draft guidelines for the Urban Greening for Sustainable Communities Program.

We greatly appreciate the time and thought that the Strategic Growth Council put into these guidelines to make the process smooth and clear for prospective applicants and to meet the intent of the program. We also appreciate that the Council hosted public workshops to explain the program and field questions and comments.

As the California Public Grants Manager for The Trust for Public Land, I would like to submit these comments and questions. Please note that the following comments are all regarding the *Projects* program.

Page 5. Applicants. If possible, TPL suggests also including Special Districts (i.e. park and recreation districts) to the list of eligible applicants.

Page 5. Projects. I would appreciate greater clarification as to what "use natural systems" means as a project type.

Page 5. Location. Please clarify: does "places of 2,500 or more persons outside urbanized areas" mean suburban areas, or could this also be rural (not attached to an "urbanized" area). How would one determine if a project is located in an urban/urbanized area- is this defined by county population, city population, census tract population? Is population to be determined by the 2000 Census info, CA Dept of Finance numbers, or some other set standard? I think there needs to be greater clarity here to determine what projects are truly eligible and to make sure that projects are truly targeting the "urban" communities that are the intent of the program.

Page 5. Targeted Funds for Disadvantaged Communities. What is the intent of this set-aside of funds? Is it to help Disadvantaged Communities? If so, Disadvantaged Communities are already favored in this program, no matter the size of the request, as projects in these communities can score up to 9 points (pursuant to chart on page 6) more than projects not located in a Disadvantaged Community. Is the intent to set aside money for small projects? If so, then why the extra Disadvantaged Community focus, when they are already favored in the program?

TPL suggests a set aside for small projects, such as tree plantings, etc, but with the removal of the Disadvantaged Communities focus because higher points are automatically given to all applications that are in Disadvantaged Communities.

Page 6. The box under evaluation/scoring criteria says that there are 30 total possible points for SGC Urban Greening priorities, and yet this box also indicates that the point range in this section is 0-25. Please clarify the total points possible.

Pages 10, 11, 12, and 13: Multiple Benefits: As currently written, the wording of the application seems ask for quantitative and measurable results about reduction of natural resources, increase in water supply, reductions in air pollution, reduction of GHG emissions, health benefits etc. I believe that quantifying or demonstrating such benefits may be difficult and onerous, and may not be possible. As Polly Escovedo mentioned at the December 1 workshop, providing quantifiable measurables for these benefits are *not* the intent. I appreciate that the SGC team members recognize this, and I suggest modifying the wording to help make this clear.

TPL recommends removing all "what approach was used to determine said reductions/benefits" questions. Measures such as recycled-content materials, filtration of storm water, living roofs, drip irrigation systems, etc to achieve desired benefits of natural resources preservation, climate change adaptability, etc are already recognized as beneficial measures for urban greening/ environmental sustainability. As such, it feels a bit awkward to try to explain *why* one is using such measures. Without the "what approach" questions, I think you will still get the answers you are seeking and will allow applicants to explain what the project will do to help advance decreases in air/water pollution, reduction in consumption of natural resources, increase in reliability of local water supplies, and/or increased adaptability to climate changes.

Page 11. Under Multiple Benefits, I feel that there is some redundancy in the questions regarding b3) Reduction in water consumption and c3) Increase of reliability of local water supplies. Wouldn't increasing reliability of water supplies include a reduction of consumption or other water preservation measures? TPL suggestions folding question b3 into either b1) (reducing consumption of natural resources) or c1) (increasing reliability of local water supplies).

Page 12. Questions 8 and 9 asks if applicants ("you") have performed assessments of vegetation or community green spaces in your community? I think it makes sense to rephrase these questions to ask if there are available community green space assessments or vegetative assessments. I think it is reasonable to think that other entities (besides the applicant itself) might have performed such assessments.

Pages 12 and 13. I feel there is some redundancy in the questions that ask about innovation and creativity. For example, answers to question 2 at the bottom of page 12 (Describe innovative partnerships, financing, and outreach) can be addressed in the Interagency Cooperation section or in the Innovative and/or Creative section. I think that question 2 at the bottom of page 12 can easily be eliminated because any answers to this question would most certainly be addressed in these other sections.

Page 13. Innovative and/or Creative section. Asking two separate questions about how the project is innovative and creative (#1) and how the project is "out of the box" (#2) might be redundant. TPL suggests folding into just one question.

Page 14. Vulnerability to Climate Change. I am unsure how an applicant would demonstrate vulnerability to climate change. At the December 1 meeting I believe

there was reference to a committee member that might answer questions about this. I anticipate that this section would be tricky for many applicants. I suggest a "Technical Assistance" section in the guidelines specifically focused on answering this question.

Page 15. Under Organizational Capacity header, Question #5 asks, "How does the project contribute to fairness and equity in your community?" TPL proposes removing this question from this section, as it does not specifically relate to Organizational Capacity and is addressed under Environmental Justice Issues.

Pages 16 and 17. TPL suggests that "Documentation of Community Support" be included as a section for What to Submit. This would include any letters of support (from local City, County government, watershed groups, community organizations, etc) or other relevant documents regarding partnerships or community outreach/participation.

### **Other General Comments**

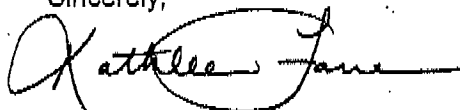
Match Requirements: TPL supports a no-match requirement.

RFP period: TPL recommends at least a 60-day period between the release of the guidelines and the deadline for applications. If at all possible, I would also encourage consideration of other major state grant deadlines (i.e. River Parkways, Statewide Park Development Program, EEMP, etc) when setting the due date for the Urban Greening Program to minimize undue burden on applicants.

Pre-application discussion: During the December 1 workshop, there was much discussion about the pros and cons of including a pre-application. While review and ranking of pre-applications might create more work for applicants and the review committee on the front end, the end result would be a substantial savings of both time and resources for applicants and the review committee. As a potential applicant, it is of great value to me to know that I am directing my energies towards applications that I know are going to be competitive. Preparing a short pre-application is a small investment of time and resources in comparison to the preparation of a full application. Using a pre-application process would also help ensure that the review committee is only reviewing projects that are strong fits with the intent of the program. With the broad nature of this program, I think the Council will be flooded with applications. I strongly encourage the use of a pre-application process that will narrow down the pool, thus benefiting both potential applicants and reviewers.

Thank you for your consideration of my comments. If you would like further clarification on any of my comments, I would be happy to discuss with you in greater detail.

Sincerely,



Kathleen Farren  
California Public Grants Manager